



27th Floor
1633 Broadway
New York, NY 10019-6708

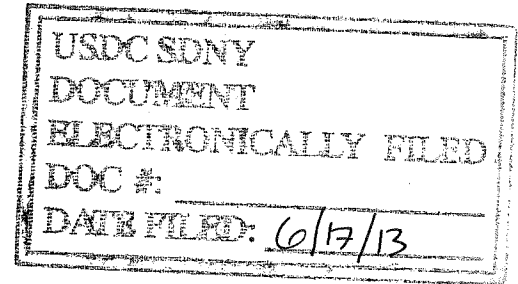
Marcia B. Paul
212.603.6427 tel
212.489.8340 fax

marciapaul@dwt.com

June 17, 2013

VIA FACSIMILE

Hon. Deborah A. Batts
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2510
New York, NY 10007



MEMO ENDORSED

Re: *Carney et al v. Chesky Records, Inc. et al.*, 13 Civ. 405 (DAB)

Dear Judge Batts:

We represent the Defendants in this case, and write on behalf of all of the parties. We write to request a final limited extension of the deadline for Defendants to answer, move or otherwise respond to the Complaint to this Friday, June 21, 2013. Absent an extension the deadline would be today, June 17, 2013. The parties jointly called Your Honor's chambers by telephone today and Your Honor's clerk instructed us to submit this request by fax. The Court has previously extended this deadline three times. No scheduling order has been issued by the Court and no previously scheduled dates will be affected by this extension.

granted
no extensions
S/DAB
6/17/13

The parties participated in private mediation in May and reached an agreement on a settlement amount, but have been actively working on finalizing the terms of the settlement agreement. This process has taken more time than expected, in part because there are numerous parties involved and because the agreement itself is somewhat complicated. The parties believe that they have made substantial progress in settling the case, and would appreciate the Court's accommodation in granting this limited extension of several more days to finalize the agreement. If the parties have not finalized an agreement by June 21, the Defendants will promptly file their Answers and/or Motions.

We appreciate the Court's consideration of this request.

MEMO ENDORSED

Respectfully Submitted,

Marcia B. Paul

Marcia B. Paul

SO ORDERED

cc: Christine Lepera, Esq., Mitchell Silberberg & Knupp LLP (via email)

Deborah A. Batts

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

www.dwt.com

Anchorage
Bellevue
Los Angeles

New York
Portland
San Francisco

Seattle
Shanghai
Washington, D.C.

6/17/13